

Tab 17

Mark Brody v. AstraZeneca Pharmaceuticals, LP

2/28/2008

Witness: Cindy Atha

1 calls.

2 BY MR. KRAVEC:

3 Q As long as the quality of the call is within
4 the company's acceptable range, the company doesn't
5 discourage someone from making more than 11 calls on
6 prescribers in a day, do they?

7 A No.

8 Q And in fact the more prescribers you see,
9 hopefully that will translate into better performance,
10 wouldn't it?

11 A Hopefully the more prescribers they see, the
12 better sales they generate.

13 Q And in order to move to the next level to be
14 promoted within AstraZeneca, isn't one of the big
15 factors what the PSSs performance is?

16 MR. JOHNSON: Objection. Vague.

17 THE WITNESS: What type of performance?

18 BY MR. KRAVEC:

19 Q Their job performance, their sales?

20 A Sales is one of the components.

21 Q Is it a pretty big component?

22 A It's one of the four components, yes.

23 Q What are the four components?

24 A Sales -- there are four categories. Sales,
25 professionalism, knowledge, and customer which is --

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Witness: Cindy Atha

1 sales, professionalism, customer and development.

2 Q And is sales weighted, or are they all an equal
3 percentage that go into the determination of whether or
4 not one will be promoted?

5 A Sales is a factor.

6 Q Is it a bigger factor than the other three?

7 A For promotions?

8 Q Yes.

9 A Not necessarily.

10 Q Is it frequently?

11 MR. JOHNSON: Objection. Vague. Just to go
12 back to the other three, you mean any other way or any
13 other factor individually?

14 BY MR. KRAVEC:

15 Q When the factors are being weighed in order to
16 determine whether or not to promote someone, is it
17 frequent that sales are the biggest of the four factors
18 considered by AstraZeneca for promotion?

19 A I need to ask a clarifying question. When you
20 say promotion, do you mean promotion within sales or
21 promotion into other leadership roles?

22 Q If there's a different answer for those two,
23 then give me the differentiation.

24 A There's a different answer.

25 Q Then please give me the differentiation.